January 10, 2002

Mr. Larry Hinkle
Visteon Systems, LLC
4747 Western Avenue
Connersville, IN 47331

Re: 041-14961
First Significant Permit Modification to
Part 70 No.: T 041-6896-00004

Dear Mr. Larry Hinkle:

Visteon Systems, LLC was issued Part 70 operating permit T041-6896-00004 on February 17, 1999, for an automotive parts manufacturing plant. A letter requesting changes to this permit was received on August 2, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document and as follows (bold emphasis added to new language):

1. The emission units and pollution control equipment summary list in Section A.2, Items (12) through (19), on Page 6 of the permit shall be revised as follows:

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compounds (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour;

(**13**~~12~~) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;

(**14**~~13~~) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;

(**15**~~14~~) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;

(**16**~~15~~) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and

(**17**~~16~~) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

2. A new Section D.8 (FACILITY OPERATION CONDITIONS) shall be added to a new page Page 46b of the permit to be consistent with the addition of Thermal De-Oiler #3 and its thermal incinerator.

Facility Description [326 IAC 2-7-5(15)]

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compound (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour.

Construction Conditions [326 IAC 2-1-3]

D.8.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

(b) This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.8.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

D.8.3 Revocation of Permits [326 IAC 2-1.1-9] [326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

D.8.4 Permit Review Rules [326 IAC 2]

All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]

D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. Emissions from the thermal de-oiler shall be limited to 0.004 pound of VOC emitted per pound of oil used. This limit also limits VOC emissions for the thermal de-oiler to less than the PSD applicability threshold of 40 tons per year.

Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

D.8.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal de-oiler (De-oiler #3) and the thermal incinerator controlling VOC emissions.

Compliance Determination Requirements

D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to demonstrate compliance with the 0.004 pound of VOC emitted per pound of oil used emission limit in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.8.8 Monitoring

(a) The thermal incinerator shall operate at all times that the process is in operation. When operating, the thermal incinerator on De-oiler #3 shall maintain a minimum operating temperature of 1,500° F and a gas residence time in the oxidizing zone for the incinerator of 1.5 seconds or a temperature and gas residence time determined in the compliance tests described in Condition D.8.7.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

(a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.8.5.

(1) The amount and VOC content of each de-oiling material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total VOC and oil usage for each month;

(3) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.

(4) The gas residence time in the oxidizing zone for the thermal incinerator to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext.3206 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
AB/EVP
cc: File - Fayette County
Fayette County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 SIGNIFICANT PERMIT MODIFICATION
OFFICE OF AIR QUALITY

Visteon Systems LLC
4747 Western Avenue,
Connersville, Indiana 47331

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T041-6896-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 17, 1999 Expiration Date: February 17, 2004

First Administrative Amendment 041-10719 issued on April 10, 1999.
Second Administrative Amendment 041-11046 issued on August 5, 1999.
First Minor Permit Modification 041-12053 issued on May 25, 2000.

First Significant Permit Modification: 041-14961-00004	Pages Affected: 3, 6, 46b, 46c, 46d and 50a
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 10, 2002 Expiration Date: January 10, 2007

D.8 FACILITY OPERATION CONDITIONS - Thermal De-oiler

Construction Conditions [326 IAC 2-1-3]

D.8.1 General Construction Conditions
D.8.2 Effective Date of the Permit [IC 13-15-5-3]
D.8.3 Revocation of Permits [326 IAC 2-1.1-9] [326 IAC 2-7-10.5(i)]
D.8.4 Permit Review Rules [326 IAC 2]

Operation Conditions

Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]
D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]
D.8.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)

Compliance Determination Requirements
D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements
D.8.8 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.8.9 Record Keeping Requirements

(9) one (1) Evaporator Plate Fin B & B conveyorized vapor degreaser (ID No. 2DGR), using a maximum of 38.1 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB2) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;

(10) one (1) thermal de-oiler (De-oiler #1) processing a maximum of 6,000 pounds of metal parts per hour, using a maximum of 30 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 7.5 million (MM) British thermal units (Btu) per hour for control of volatile organic compounds (VOC), exhausting through two (2) stacks (DO1 and DO2);

(11) one (1) thermal de-oiler (De-oiler #2) processing a maximum of 2400 pounds of metal parts per hour, using a maximum of 66.1 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 2.3 MMBtu per hour for control of VOC, exhausting through one (1) stack (DO3);

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compound (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour;

(13) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;

(14) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;

(15) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;

(16) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and

(17) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); and

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compound (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour.

Construction Conditions [326 IAC 2-1-3]

D.8.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

(b) This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.8.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

D.8.3 Revocation of Permits [326 IAC 2-1.1-9] [326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

D.8.4 Permit Review Rules [326 IAC 2]

All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]

D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. Emissions from the thermal de-oiler shall be limited to 0.004 pound of VOC emitted per pound of oil used. This limit also limits VOC emissions for the thermal de-oiler to less than the PSD applicability threshold of 40 tons per year.

Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

D.8.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal de-oiler (De-oiler #3) and the thermal incinerator controlling VOC emissions.

Compliance Determination Requirements

D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to demonstrate compliance with the 0.004 pound of VOC emitted per pound of oil used emission limit in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.8.8 Monitoring

(a) The thermal incinerator shall operate at all times that the process is in operation. When operating, the thermal incinerator on De-oiler #3 shall maintain a minimum operating temperature of 1,500° F and a gas residence time in the oxidizing zone for the incinerator of 1.5 seconds or a temperature and gas residence time determined in the compliance tests described in Condition D.8.7.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

(a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.8.5.

(1) The amount and VOC content of each de-oiling material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total VOC and oil usage for each month;

(3) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.

(4) The gas residence time in the oxidizing zone for the thermal incinerator to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Significant Source Modification / Significant Permit Modification

Source Name:	**Visteon Systems, LLC**
Source Location:	**4747 Western Avenue, Connersville, Indiana 47331**
County:	**Fayette**
SIC Code:	**3714**
Operation Permit No.:	**T041-6896-00004**
Operation Permit Issuance Date:	**February 17, 1999**
Source Modification No.:	**041-14742-00004**
Permit Modification No. :	**041-14961-00004**
Permit Reviewer:	**AB/EVP**

On November 1, 2001, the Office of Air Quality (OAQ) had a notice published in the local newspaper, Connersville, Indiana, stating that Visteon Systems, LLC had applied for a Significant Source and Permit Modification to construct a new thermal de-oiler (De-oiler #3) with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 15, 2001, Visteon Systems, LLC submitted comments on the proposed Significant Source/Permit Modification. The summary of the comments is as follows:

Comments

1. Condition D.8.5 - This condition states that the thermal de-oiler "shall use less than 723.6 tons of oil per 12 consecutive month period" and that "the VOC shall be limited to 0.081 pound of VOC/pound of oil used." Visteon offers the following comments regarding this condition:

   (a) Visteon does not believe that the limitation on oil use is necessary for this unit. This 'limit' seems merely to reflect the maximum equipment capacity, and is not necessary to avoid the applicability of any State or Federal regulations. Visteon requests that the reference to a limitation on oil usage be deleted from this condition.

   (b) Visteon does not believe that the quantity of VOC that is generated from oil consumption (0.081 pound of VOC per pound of oil used) should appear as a limitation in the permit. Again, this merely reflects the estimated potential emission rate of the system, and is not necessary to avoid or comply with any State or Federal regulations. To use an analogous example, IDEM does not specify the uncontrolled NOx emission factor in permitting a natural gas -fired boiler, unless such a limit is necessary to avoid rule applicability. Visteon requests that the reference to VOC generated per pound of oil used be deleted from this condition.

2. Condition D.8.5 - In addition to the oil and VOC emission factor limitation noted above, this condition also requires that the thermal incinerator achieve “a minimum overall VOC control efficiency (including capture and destructive efficiencies) of 95%”. The 95% overall control efficiency is based upon design information related to the VOC loading that the de-oiler is expected to generate and send to the thermal incinerator. In the event the VOC loading is significantly below the level used for design purposes, it is possible that the control efficiency of the system may drop below 95%. In such instances, Visteon might be in violation of this permit condition, even though actual VOC emission rates were below those predicted in its application. As a consequence, Visteon requests that this requirement be reworded as follows:

   > VOC emissions from the thermal de-oiler shall be limited to 0.67 pounds per hour unless controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%.

3. Condition D.8.9 - as noted in the comment above, Visteon does not believe that an oil usage limitation is necessary for this equipment. Such conditions are not required to avoid the applicability of any State or Federal regulation, nor are there any such conditions contained in the permit conditions for the existing de-oilers. Visteon requests that any records requested in this condition that relate to the “VOC usage limits and/ or the VOC emission limits established in Condition D.8.5" be deleted. Visteon believes that this would include requirements in conditions D.8.9(a)(1), (2), (3), and (4). In addition Visteon suggests that the wording of Conditions D.8.9(a)(5) and (6) be revised to be consistent with Visteon’s existing De-oiler record keeping requirements, which requires:

   > The permittee shall maintain records of the operating temperature and gas residence time in the oxidizing zone for each of the two (2) thermal incinerators, controlling VOC emissions from the two (2) thermal de-oilers. [Condition D.4.4]

4. Condition D.8.10 - This condition requires that Visteon complete a quarterly summary of “the information to document compliance with Condition D.8.5.” Since the “VOC usage limitation” that is contained in Condition D.8.5 is not necessary (as noted in the comments above), Visteon does not believe a quarterly summary is necessary for this emission unit. Accordingly, Visteon requests that this condition be deleted, and that the Part 70 Quarterly Report form that is attached to the permit be deleted as well.

5. Technical Support Document - Changes to the Technical Support Document should be made consistent with comments provided above.

Response to Comments

The VOC limitations in the permit will be adjusted so that a limitation of 0.004 pound of VOC emitted per pound of oil used will replace the oil usage limit and the previous VOC emission factor limitation. This emission limit represents 5% of the maximum uncontrolled emissions of 0.081 pound of VOC per pound of oil.

Those conditions related to the oil usage limit have been deleted or adjusted to incorporate the new limit. Condition D.8.10 and the quarterly report form for oil usage have been deleted. Conditions D.8.5, D.8.7, and D.8.9 are revised to read as follows:

D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. ~~The~~ **Emissions from the** thermal de-oiler ~~shall use less than 723.6 tons of oil per 12 consecutive month period. The VOC~~ shall be limited to ~~0.081pound of VOC/ pound of oil used~~ **0.004 pound of VOC emitted per pound of oil used**. ~~These~~ **This** limit~~s are required to limit~~ also limits VOC emissions for the thermal de-oiler to less than **the PSD applicability threshold of 40 tons per year.** ~~58.69 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%.~~

Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to ~~confirm the validity of the uncontrolled VOC emission factor of 0.081 lb of VOC /lb oil used~~ **demonstrate compliance with the 0.004 pound of VOC emitted per pound of oil used**~~, as well as the VOC control efficiency for the one (1) thermal incinerator,~~ **emission limit** ~~as required~~ in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.8.9 Record Keeping Requirements

(a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(4)** below. Records maintained for (1) through ~~(6)~~**(4)** shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC ~~usage limits and/or the VOC~~ emission limits established in Condition D.8.5.

(1) The amount and VOC content of each de-oiling material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

~~(2) A log of the dates of use; and~~

~~(3)~~**(2)** The total VOC **and oil** usage for each month;

~~(4) The weight of VOCs emitted for each compliance period.~~

~~(5)~~**(3)** The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.

~~(6)~~**(4)** The gas residence time in the oxidizing zone for the thermal incinerator to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.8.10 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.8.5 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

The Technical Support Document is not revised for these changes. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source / Permit Modification

Source Background and Description

Source Name:	**Visteon Systems, LLC**
Source Location:	**4747 Western Avenue, Connersville, Indiana 47331**
County:	**Fayette**
SIC Code:	**3714**
Operation Permit No.:	**T041-6896-00004**
Operation Permit Issuance Date:	**February 17, 1999**
Source Modification No.:	**041-14742-00004**
Permit Modification No. :	**041-14961-00004**
Permit Reviewer:	**Alic Bent/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Visteon Systems, LLC relating to the construction and operation of a modification to the automotive parts manufacturing plant.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compounds (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (scfm)	Temperature (^{0}F)
	De-Oiler #3	**55**	**1.5**	**5000**	**1400**

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Significant Source Modification application for the purposes of this review was received on August 2, 2001 .

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.20
SO_2	0.00
VOC	58.79
CO	2.00
NO_x	2.40

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Justification for Modification

The Title V source is being modified through a Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(g) because potential VOC emissions are greater than 25 tons per year.

County Attainment Status

The source is located in Fayette County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Fayette County has been designated as attainment or unclassifiable for ozone.

(b) Fayette County has been classified as attainment or unclassifiable for all other regulated air pollutants. Therefore, these emissions were reviewed pursuant to the requirements for the prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO_2	greater than 100, less than 250
VOC	greater than 250
CO	less than 100
NOx	less than 100

(a) This existing source is a major stationary source because at least one regulated pollutant is emitted at a rate of 250 tons per year or more.

(b) These emissions are based upon all previous approvals issued to this source.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Thermal De-Oiler #3	0.2	0.2	0.00	2.93	2.00	2.40	neg
PSD Significant Modification Threshold	25	15	40	40	100	40	N/A

This modification to an existing major stationary source is not major because the emission is less than the PSD significant levels for VOC. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

The thermal de-oiler (De-oiler #3) is equipped with a thermal incinerator for the control of volatile organic compounds (VOC). The PTE of VOC for the thermal de-oiler (after control) is 2.93 tons per year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification. The thermal de-oiler is not subject to the requirements of 40 CFR 63.460 through 63.468 (Subpart T) because it does not use halogenated solvents and is not a vapor or cold solvent cleaning machine.

State Rule Applicability - Entire Source

There are no new state rules applicable to this source during this modification review process. The applicability determination that follows is based on that conducted for the original Part 70 T041-6896-00004, issued on February 17, 1999.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and SO_2. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which emits or has the potential to emit (PTE) 10 tons per year of any HAP 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The thermal de-oiler does not emit any HAPs, therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (New facilities, General Reduction Requirements)

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The new thermal de-oiler has potential VOC emissions greater than 25 tons per year and is subject to the requirements of 326 IAC 8-1-6. The thermal de-oiler shall use less than 723.6 tons of oil per 12 consecutive month period. The VOC shall be limited to 0.081pound of VOC/ pound of oil used. These limits are required to limit VOC emissions for the thermal de-oiler to less than 58.69 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%. IDEM determined that limiting oil usage to less than 723.6 tons per 12 consecutive month period and using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95% as the emission control device is BACT for the thermal de-oiler, and therefore, satisfies the requirements of 326 IAC 8-1-6.

The emission factor of 0.081 lb of VOC / lb of oil used is based on testing conducted at the facility on De-oiler #2 in 2000.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

This rule applies to the type of degreasers described in 326 IAC 8-3-1(b) (1)(A) through (1)(C), that were constructed after July 1, 1990. The thermal de-oiler is not a degreaser as described in 326 IAC 8-3-1(b) (1)(A) through (1)(C), therefore it is not subject to the requirements of 326 IAC 8-3.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The thermal de-oiler has applicable compliance monitoring conditions as specified below:

   (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator for measuring operating temperature and the gas residence time in the oxidizing zone. The output of this system shall be recorded, and the temperature and gas residence time shall be greater than or equal to the temperature and gas residence time used to demonstrate compliance during the most recent compliance stack test.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the thermal incinerator control system must operate properly to ensure compliance with 326 IAC 8-1-6 and 326 IAC 2-2.

Proposed Changes to the Part 70 Permit.

(a) The following changes have been made to Section A.2 of the permit to state that the new unit De-oiler #3 has been added to the plant.

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compounds (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour;

(**13**~~12~~) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;

(**14**~~13~~) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;

(**15**~~14~~) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;

(**16**~~15~~) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and

(**17**~~16~~) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

(b) A new section D.8 has been added to the permit to account for the new unit De-oiler #3 has been added to the plant.

Facility Description [326 IAC 2-7-5(15)]

(12) one (1) thermal de-oiler (De-oiler #3) processing a maximum of 1500 metal parts per hour, using a maximum of 165.2 pounds of oil per hour, equipped with a natural gas fired thermal incinerator for volatile organic compound (VOC) control. The thermal incinerator has a heat input rate of 5.5 million (MM) British thermal units (Btu) per hour.

Construction Conditions [326 IAC 2-1-3]

D.8.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

(b) This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

D.8.2 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

D.8.3 Revocation of Permits [326 IAC 2-1.1-9] [326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

D.8.4 Permit Review Rules [326 IAC 2]

All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 8-1-6] [326 IAC 2-2]

D.8.5 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

Pursuant to 326 IAC 8-1-6, the thermal incinerator (rated at 5.5 MMBtu per hour) on the one (1) thermal de-oiler (De-oiler #3) shall be in operation at all times that the de-oiler is in operation. The thermal de-oiler shall use less than 723.6 tons of oil per 12 consecutive month period. The VOC shall be limited to 0.081pound of VOC/ pound of oil used. These limits are required to limit VOC emissions for the thermal de-oiler to less than 58.69 tons of VOC per 12 consecutive month period. VOC emissions from the thermal de-oiler shall be controlled using the thermal incinerator with a minimum overall VOC control efficiency (including capture and destruction efficiencies) of 95%.

Compliance with the requirement shall also render 326 IAC 2-2 not applicable.

D.8.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal de-oiler (De-oiler #3) and the thermal incinerator controlling VOC emissions.

Compliance Determination Requirements

D.8.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on Thermal De-oiler #3 to confirm the validity of the uncontrolled VOC emission factor of 0.081 lb of VOC /lb oil used, as well as the VOC control efficiency for the one (1) thermal incinerator, as required in Condition D.8.5, utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements

D.8.8 Monitoring

(a) The thermal incinerator shall operate at all times that the process is in operation. When operating, the thermal incinerator on De-oiler #3 shall maintain a minimum operating temperature of 1,500° F and a gas residence time in the oxidizing zone for the incinerator of 1.5 seconds or a temperature and gas residence time determined in the compliance tests described in Condition D.8.7.

(b) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.9 Record Keeping Requirements

(a) To document compliance with Conditions D.8.5 and D.8.8, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.8.5.

(1) The amount and VOC content of each de-oiling material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use; and

(3) The total VOC usage for each month;

(4) The weight of VOCs emitted for each compliance period.

(5) The continuous temperature records for the thermal incinerator and the temperature used to demonstrate compliance during the most recent compliance stack test.

(6) The gas residence time in the oxidizing zone for the thermal incinerator to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.8.5 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Visteon Systems, LLC
Source Address: 4747 Western Avenue, Connersville, IN 47331
Mailing Address: 4747 Western Avenue, Connersville, IN 47331
Part 70 Permit No.: T041-6896-00004
Facility: Thermal De-oiler #3
Parameter: VOC
Limit: Less than 723.6 tons of oil per 12 consecutive.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The operation of this automotive parts manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. SSM 041-14742-00004 and Significant Permit Modification No. SPM 041-14961-00004.

Appendix A: Emission Calculations
VOC and Particulate
From Thermal De-Oiler

Company Name: Visteon Systems LLC
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
SSM No.: 041-14742
Plt ID: 041-00004
Reviewer: Alic Bent/EVP
Date: August 31, 2001

State Potential Emissions (uncontrolled):

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/hr)	Pounds VOC per gallon	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Oak Draw 951 (Oil)	De-Oiler #3	6.50	100.00%	0.00%	100.00%	0.00%	0.00%	2.062	6.50	13.40	321.60	58.69	0.00	N/A	100.00%

Total Potential Emissions:	**13.40**	**321.60**	**58.69**	**0.00**

	VOC	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
Total Controlled Emissions:	95.00%	**0.67**	**16.08**	**2.93**	**0.00**

Methodology:

Pounds of VOC per Gallon = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Visteon Systems, LLC
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Source Modification No.: 041-14742
Plt ID: 041-00004
Reviewer: Alic Bent/EVP
Date: September 14, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.5	48.2

Heat Input Capacity includes:
Supplementary fuel heat input rate for the thermal oxidizer on De-oiler #3.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.2	0.2	0.0	2.4	0.1	2.0

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 100, Low NOx burner = 83, Flue gas recirculation = 30
Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 34
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: Visteon Systems, LLC
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Source Modification No.: 041-14742
Plt ID: 041-00004
Reviewer: Alic Bent/EVP
Date: September 14, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.059E-05	2.891E-05	1.807E-03	4.336E-02	8.191E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.205E-05	2.650E-05	3.373E-05	9.154E-06	5.059E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.